

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO.: 1:21CR226
	)	
Plaintiff,	)	JUDGE PAMELA A. BARKER
	)	
v.	)	
	)	
	)	<u>MOTION FOR PROTECTIVE ORDER</u>
DAVIS LU,	)	
	)	
Defendant.	)	

Now comes the United States of America, through its counsel, Bridget M. Brennan, Acting United States Attorney, Brian S. Deckert and Daniel J. Riedl, Assistant United States Attorneys, and hereby submits this unopposed Motion for Protective Order agreed to by the parties governing the provisions of discovery materials to the Defendant in this case pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure. Such protective order is necessary, to reasonably protect the interests of the owners of the information which contains proprietary information from Eaton Corp. in this matter.

A proposed Stipulated Protective Order is attached, which counsel for the Defendant and Eaton Corp. have reviewed and approved.

WHEREFORE, the Government respectfully requests that the Court adopt the proposed Stipulated Protective Order, and further to allow the Government to supplement its arguments in support in any additional briefing or hearing, as the Court may deem necessary.

Respectfully submitted,

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Acting United States Attorney

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